

# ORIGINAL

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

04 CV 12137 JLT

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SUZANNE GENEREUX and BARRY GENEREUX, w/h, \*  
Individually and as Parents and Natural \*  
Guardians of their minor children, ANGELA \*  
GENEREUX and KRISTA GENEREUX, \*  
Plaintiffs, \*

V

AMERICAN BERYLLIA CORP., BRUSH WELLMAN, \*  
INC., BRUSH WELLMAN CERAMICS, INC., BRUSH \*  
WELLMAN CERAMIC PRODUCTS, INC., HARDRIC \*  
LABORATORIES, INC., KYOCERA AMERICA, INC., \*  
KYOCERA INDUSTRIAL CERAMICS CORP., and \*  
RAYTHEON COMPANY, \*  
Defendants. \*

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Videotape Deposition of HARDRIC  
LABORATORIES, INC., By PETER N. RICHARD, taken  
on behalf of the Plaintiffs, pursuant to Notice  
under the Federal Rules of Civil Procedure  
30(b)(6), before Janice A. Maggioli, RPR, RMR,  
CRR, and Notary Public in and for the  
Commonwealth of Massachusetts, at the offices  
of Meehan, Boyle, Black & Fitzgerald, Two  
Center Plaza, Boston, Massachusetts, on May 25,  
2006, commencing at 1:44 p.m.

MAGGIOLI REPORTING SERVICES, INC.  
48 Watson Street  
Braintree, Massachusetts 02184  
(781) 356-2636

1 Q. How long has Hardric done business there?

2 A. Approximately ten years.

3 Q. So since roughly '96?

4 A. Roughly.

5 Q. Has it from then until now maintained any other  
6 places of business?

7 A. We had a plant in Waltham at 1490 Main Street.

8 Q. When was that?

9 A. From 1960 through -- and it was finally  
10 abandoned about three years ago, so the shop  
11 was active there for that period of time.

12 Q. So from roughly '96 to 2003 Hardric operated  
13 two facilities?

14 A. Yes.

15 Q. Did it operate any other facilities between '96  
16 and the present?

17 A. No.

18 Q. What did you do in -- is it Chelmsford or  
19 Chelmsford?

20 A. Chelmsford.

21 Q. What did the company do at the Chelmsford  
22 location versus the Waltham location when they  
23 operated simultaneously?

24 A. We moved the majority of our shop to North

1 Chelmsford. There were two employees who had  
2 been working for us for many years and could  
3 not move or make that drive to North  
4 Chelmsford. We kept the shop opened there so  
5 that they would continue to have a job, and  
6 finally when one of them died and the other  
7 retired, we closed that plant.

8 Q. Would it be fair to say that the operations  
9 that you did at Waltham were the same as those  
10 that took place at Princeton?

11 A. Oh, yes.

12 Q. And how many employees altogether would you say  
13 you had from '96 to the present?

14 A. Around 30.

15 Q. Three zero?

16 A. Three zero.

17 Q. And I asked the question poorly. How many did  
18 you have at any one time? What was the maximum  
19 during that period of time?

20 A. 30.

21 Q. Tell me what kinds of operations you maintained  
22 at these locations.

23 A. Waltham evolved into an optics operation. We  
24 did -- made mirrors at that operation, scan